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Trustee in Bankruptcy
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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 In re

12 DONALD C. PIPKINS
and
13 LORNA D. PIPKINS,
14 Debtors.

Case No. 13-30087 DM
Chapter 7
Hon. Dennis Montali

**DECLARATION OF JENNIFER C.
HAYES IN RESPONSE TO COURT'S
MEMORANDUM DECISION
REGARDING STRUCTURED
SETTLEMENT ANNUITY (Docket # 133)**

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20 I, Jennifer C. Hayes, declare as follows:

21 1. I am an attorney with the law firm of McKenna Long & Aldridge LLP ("MLA"),
22 counsel of record for Barry Milgrom, Chapter 7 Trustee ("Trustee"). This declaration is filed in
23 response to the Court's Memorandum Decision Regarding Structured Settlement Annuity entered
24 June 17, 2014 as Docket Entry No. 133.

25 2. MLA incurred fees totaling \$5,600 and expenses totaling \$70.49 in connection with
26 the Trustee's Reply in Support of Sale Motion and Objection to Second Amended Schedule C,
27 filed as Docket No. 120 on May 12, 2014 (the Reply"). Attached as **Exhibit A** is an accurate and
28 authentic summary of the attorneys' fees and costs incurred in preparing the Reply .

3. On June 25, 2014, I e-mailed to Mr. Pipkins a settlement proposal made by the Trustee. As of the date of this declaration, I have not received a response to the Trustee's settlement proposal.

I declare under penalty of perjury that the above statements are true and that if called as a witness I could and would testify to their truthfulness. This declaration is executed on the 30th day of June 2014 in San Francisco, California.

/s/Jennifer C. Hayes, Esq., CSBN 197252
Jennifer C. Hayes

USW 804572010.1

In re Donald and Lorna Pipkins, Chapter 7 Case No. 13-30087 DM
Summary of Attorneys' Fees and Costs
McKenna Long Aldridge LLP

Attorneys Fees and Costs Incurred in Preparation of Reply Brief (April 25, 2014 through May 12, 2014)			
Date	Description	Hours	Fees
04/28/14	REVIEW COURT'S ORDER REGARDING BRIEFING SCHEDULE AND RESEARCH DEBTOR'S APPARENT NONCOMPLIANCE (.1); REVIEW DEBTORS' DECLARATION (.1); REVIEW WALSH DECLARATION (.1); REVIEW MPA IN SUPPORT OF DEBTORS' RESPONSE TO TRUSTEE'S OBJECTION TO AMENDED SCHEDULE C (.1);	0.4	\$160.00
05/07/14	BEGIN DRAFTING RESPONSIVE BRIEF (.1)	0.1	\$40.00
05/08/14	LEGAL RESEARCH REGARDING REPLY BRIEF (.3); DRAFT REPLY BRIEF (.9);	1.2	\$480.00
05/09/14	LEGAL RESEARCH REGARDING REPLY BRIEF (1.7); DRAFT REPLY BRIEF (1.3)	3.0	\$1,200.00
05/10/14	REVIEW CASES INTERPRETING 703.140(B)(10) AND (B)(11) (.9); DRAFT REPLY BRIEF (1.2); DRAFT DECLARATION (.3);	2.4	\$960.00
05/12/14	DRAFT, REVIEW, AND REVISE REPLY BRIEF AND SUPPORTING DECLARATION (6.9)	6.9	\$2,760.00
TOTAL FEES		14.0	\$5,600.00
05/12/14	WestLaw Resarch		\$65.00
05/12/14	Postage		\$5.49
TOTAL COSTS			\$70.49
TOTAL FEES AND COSTS			\$5,670.49